

BRADLEY S. MAINOR, ESQ.  
Nevada Bar No. 7434  
JOSEPH J. WIRTH, ESQ.  
Nevada Bar No. 10280  
ASH MARIE GANIER, ESQ.  
Nevada Bar No. 14712  
**MAINOR WIRTH, LLP**  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148-5652  
Tel: (702) 464-5000  
Fax: (702) 463-4440  
[ash@mwinjury.com](mailto:ash@mwinjury.com)  
*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANGELA ALLEN, individually;  
  
Plaintiff,

vs.

TARGET CORPORATION, a Foreign  
Corporation; DOES I – X, inclusive; and  
ROE CORPORATIONS I – X, inclusive,  
  
Defendants.

CASE NO.: 2:17-cv-02204-APG-NJK

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
FILE STIPULATION OF DISMISSAL**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Stipulation and Order of Dismissal deadline in the above-captioned matter. Good cause exists to extend the remaining deadline for the reasons explained below.

**A. Reasons For the Extension**

On February 12, 2020, the parties attended a successful settlement conference before Judge Koppe. The parties entered into a binding agreement and recorded its provisions in a sealed Court order. Subsequently, the Court entered its minutes and ordered the parties to file a stipulation and proposed order of dismissal by March 25, 2020. Minutes (ECF No. 50). The

1 parties hereby request that this Court extend the deadline for the parties to file their stipulation of  
2 dismissal in the above captioned matter.

3 Since the date of settlement conference Plaintiff has diligently worked to reduce Plaintiff's  
4 medical lien in accordance with the provisions of the settlement agreement. Today, Plaintiff's  
5 counsel received the finalized negotiation. Defendant will now provide the Release Agreement  
6 and Plaintiff will approve as to form and content.

7 In anticipation of the parties' good faith negotiations over the language of the Release  
8 Agreement, the parties respectfully request a 30 day extension to finalize the Release and file their  
9 Stipulation and Proposed Order for Dismissal by no later than April 24, 2020.

10  
11 DATED this 25th day of March, 2020.

12 **MAINOR WIRTH, LLP**

13 */s/ Ash Marie Ganier*

14 \_\_\_\_\_  
15 ASH MARIE GANIER, ESQ.  
16 Nevada Bar No. 14712  
17 6018 S. Fort Apache Road, Ste. 150  
18 Las Vegas, NV 89148-5652  
19 *Counsel for Plaintiff*

DATED this 25th day of March, 2020.

**PERRY & WESTBROOK, P.C.**

*/s/ Alan Westbrook*

\_\_\_\_\_  
ALAN W. WESTRBOOK, ESQ.  
Nevada Bar No. 6167  
1701 W. Charleston Boulevard, Ste. 200  
Las Vegas, NV 89102  
*Counsel for Defendant*

20 **ORDER**

21 IT IS SO ORDERED that the parties' Stipulation and Proposed Order for Dismissal is due  
22 on April 24, 2020.

23 DATED this 26 day of March, 2020.

24  
25   
26 \_\_\_\_\_  
27 **UNITED STATES MAGISTRATE JUDGE**  
28